IN THE UNITED DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

UNITED STATES OF AMERICA)
Plaintiff,)
)
)
v.) Case No.: 2:19-cr-00013
GEORGIANNA A.M. GIAMPIETRO	Chief Judge Waverly D. Crenshaw, Jr.
Defendant.)

JOINT MOTION FOR LEAVE TO FILE UNDER SEAL

The defendant, Georgianna Giampietro, through undersigned counsel, joined by the undersigned counsel for the government, hereby moves for leave to file *Proffer Summaries* (FBI 302 report of interviews) under seal. On Monday, July 11, 2022, this Court instructed the parties to file either the transcript from the defendant's proffer or an agreed summary on or before noon on Wednesday, July 13, 2022. (Doc. 429). In submitting the FBI 302s summarizing those meetings, the parties request that the documents be filed under seal, as the proffers fairly contain sensitive information, warranting their filing under seal.

Wherefore, for the reasons above, the parties jointly move for leave to file the abovedescribed documents under seal.

Respectfully submitted,

By: /s/ Charles Swift
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By: /s/ Philip H. Wehby

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/s/ Jennífer E. Levy

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 13th day of July, 2022, I electronically filed the foregoing Joint Motion for Leave to File Under Seal with the Clerk of the Court using the CM/ECF system which will send a notice of electronic filing to all counsel of record.

By: /s/ Charles Swift
Charles D. Swift, Pro Hac
Attorney for Giampietro